

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**UNITED STATES POSTAL SERVICE FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
NATIONAL POSTAL MAILHANDLERS UNION WITNESS HAYES
(USPS/NPMHU-T6-1-7)
(May 23, 2012)**

Pursuant to Rules 25 through 28 of the Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production to National Postal Mail Handlers Union witness Kenny Hayes (NPMHU-T-6).

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

Anthony F. Alverno
Chief Counsel
Global Business & Service Development

John F. Rosato

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-8597; Fax -6187
May 23, 2012

UNITED STATES POSTAL SERVICE INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO NPMHU WITNESS HAYES

Instructions and Definitions

The term “describe” shall mean to detail in full, with specificity, the event or situation at issue.

The term “documents” has the meaning as ascribed within the Federal Rules of Civil Procedure and includes any documents or things that constitute or contain matters that are relevant to the subject matter of this proceeding and that are in the custody or control of the witness.

The term “relating” shall mean pertaining, describing, referring, evidencing, reflecting, discussing, showing, supporting, contradicting, refuting, constituting, embodying, containing, concerning, identifying, or in any way logically or factually connected with the matter discussed.

The words “or” and “and” shall be read in the conjunctive and not in the disjunctive wherever they appear, and neither of these words shall be interpreted to limit the scope of a request. The use of a verb in any tense shall be construed as the use of the verb in all other tenses and the singular form shall be deemed to include the plural, and vice-versa. The singular form of any noun shall be deemed to include the plural, and vice-versa.

UNITED STATES POSTAL SERVICE INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO NPMHU WITNESS HAYES

Interrogatories and Requests for Production

USPS/NPMHU-T6-1: On page 2, lines 12 through 14 of your testimony you state:

[a]fter the Frederick consolidation into Baltimore, the Baltimore facility had major difficulties in handling the additional volume, particularly during the holiday rush.

- a Please produce any documents or data that you relied upon in support of this statement.
- b Please state the basis for any belief you may have that the current network rationalization initiative will involve the initiation of operational and service changes during the holiday rush season.

USPS/NPMHU-T6-2: On page 2, lines 21 through 23 of your testimony you state:

The Richmond P&DC, which has already absorbed the mail from Charlottesville and is scheduled to also receive the mail volume from Norfolk, has also been struggling to handle this increased mail volume.

Please produce any documents or data that you relied upon in support of your assertion that the Richmond P&DC has been "struggling" in absorbing mail from Charlottesville.

USPS/NPMHU-T6-3: On page 2, lines 23 through 26 of your testimony you state:

[o]ur Local, which is based in Richmond, sent a mailing to local members, and it took over a month for some members to receive the mailing. Although this is an extreme example, this is consistent with other complaints that we have been hearing regarding slow processing and delivery time.

- a Please describe, in detail, and provide copies of records, that would indicate the nature of the mailing sent by your Local to its members, including but not limited to a physical description of the mail pieces, the date when the mail was entered, the mail class or product paid for, the level of presortation involved, the applicable service standard, the number of pieces mailed, the address management techniques and software used in connection with the mailing, and any contemporaneously recorded tally of the percentage of pieces delivered within standard, as well as those for which delivery took over a month. Please provide copies of all communications between your Local and the Postal Service regarding this mailing.

UNITED STATES POSTAL SERVICE INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO NPMHU WITNESS HAYES

- b Based upon your exposure to mail processing, transportation, and delivery, would you agree that the late delivery of a mailpiece by a month can result from mail processing or delivery personnel errors beyond the ability of postal management to control? If you do not agree, please explain your response.
- c Please describe, in detail, the nature of the “other complaints” that are consistent with the extreme example you reference in your testimony. In doing so, identify the individuals who received the complaints, the mode of communication by which each complaint was received, and the month and year during which each complaint was received. Please also provide copies of any contemporaneously recorded summaries of these complaints, identify the origin/destination of the mail pieces involved, the mail class or product involved, and the month and day of both mailing and receipt.

USPS/NPMHU-T6-4: On page 3, lines 1 and 2 of your testimony you state: “In my experience and in my region, there is not currently excess staffing, given the current volumes of mail.”

- a Please describe, in detail, your professional training and experience related to the computation of adequate staffing levels at mail processing facilities and produce any documents or data that you relied upon in support of this statement.
- b Please state whether your statement applies to all postal employee craft and management position categories. If it does not, please identify the employee craft and management position categories to which your statement does not apply.
- c Please define the geographic scope of your postal work experience and the region to which you refer.
- d At current staffing and mail processing infrastructure levels in your region, by what percentage would current mail volumes processed in the region have to decline before you concluded that excess capacity existed?

USPS/NPMHU-T6-5: On page 3, lines 6 through 9 of your testimony you state:

By consolidating facilities or lengthening the operating windows, I do not believe that the Postal Service will be able to significantly decrease the number of hours worked.

- a Please produce any documents or data that you relied upon in support of this statement.

UNITED STATES POSTAL SERVICE INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO NPMHU WITNESS HAYES

- b Please state whether, in the nine AMP studies referenced in your testimony, the Postal Service provided calculations for the projected number of workhours at each of the losing and gaining facilities. If your answer is anything other than an unqualified affirmative response, please explain.
- c Please refer to the Response of USPS Witness Williams to Question Posed By Commissioner Taub During March 20, 2012 Cross-Examination, pages 5 through 9, which was filed on March 30, 2012, available at:

<http://www.prc.gov/Docs/81/81803/V2.p.422.HW.Dave.pdf>
<http://www.prc.gov/Docs/81/81803/Homework.Vol.2.p.422.xls>

Prior to filing your testimony with the Commission, did you have the opportunity to review and consider this response, including the information under the heading "Specific description of AMP savings calculations: mail processing workhours moving from the losing site to the gaining site?"

- d If you did not consider the materials identified in part (c), please explain why. If you did consider those materials, but disagree with the analysis and conclusions stated therein, please state the basis for your disagreement.

USPS/NPMHU-T6-6: On page 3, lines 15 through 19 of your testimony you state that at public hearings:

The Postal representatives...did not appear to be adequately informed to answer questions about the information and figures that they were presenting to the public. The Postal Service did not seem interested in public comments, and frequently cut off postal employees and union officials who tried to comment or ask questions

- a Please state the date and times of the public hearings, and furnish any notes or summaries that you prepared of those meetings.
- b Please state whether you personally attended the public hearings referenced in your statement. If you did not, please identify the person(s) on whose accounts of the meeting you rely.
- c Please describe, in detail, every instance where the Postal representatives referenced in your testimony were not informed or cut off postal employees, including but not limited to the identity of the Postal representatives, the identity of the postal employees cut off, the time and location of the public hearings where such incidents occurred, the specific information that the Postal representatives were not adequately informed to present, and the specific questions to which that Postal Representatives did not respond.

UNITED STATES POSTAL SERVICE INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO NPMHU WITNESS HAYES

USPS/NPMHU-T6-7: On page 4, lines 1 and 2 of your testimony you stated that slowing mail to rural residents: “[i]s particularly troubling for the Postal Service, which is charged with providing service to all areas of our country.”

- a On what source of authority does your statement rely?
- b Please state whether your statement assumes that the Postal Service plans to generally implement slower delivery standards for rural communities, while maintaining faster delivery standards for all other parts of the country. If not, please explain your response.